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Attorneys for Plaintiffs  
NEIL LIEBICK, SHARON CLARK,  
individually and as guardian ad litem for  
JANE DOE 1, JANE DOE 2, and JOHN  
DOE; and JASON FRANKLIN

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

NEIL LIEBICK, SHARON CLARK,  
individually and as guardian ad litem for  
JANE DOE 1, JANE DOE 2, and JOHN  
DOE; and JASON FRANKLIN,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC., COSTCO WHOLESALE CORP.,  
and DOES 1-10,

Defendants.

Case No. 2:25-cv-01300-DJC-DMC

**STIPULATION AND ORDER TO EXTEND  
PLAINTIFFS' DEADLINE TO FILE THIRD  
AMENDED COMPLAINT**

Removal Filed: May 5, 2025

1 Plaintiffs NEIL LIEBICK, SHARON CLARK, individually and as guardian ad litem for JANE  
2 DOE 1, JANE DOE 2, and JOHN DOE; and JASON FRANKLIN (“Plaintiffs”) and Defendants  
3 SAMSUNG ELECTRONICS AMERICA, INC. and COSTCO WHOLESALE CORP. also  
4 (“Defendants” (collectively “Parties”), through their respective counsel, hereby stipulate and agree as  
5 follows:

6 WHEREAS, on November 6, 2025, the Court granted in part and denied in part Defendants’  
7 Motion to Dismiss the Second Amended Complaint; (ECF No. 29);

8 WHEREAS, the Court’s Minute Order provides Plaintiffs twenty (20) days to file a Third  
9 Amended Complaint, setting a deadline of November 26, 2025 (ECF 29);

10 WHEREAS, on November 10, 2025, Defendant SAMSUNG ELECTRONICS AMERICA, INC.  
11 requested a copy of the court reporter’s transcript of the November 6, 2025, hearing, with said transcript  
12 scheduled to arrive within 14 days (ECF 30);

13 WHEREAS, as of November 25, 2025, a transcript has not yet been received by the Parties;

14 WHEREAS, absent a written order from the Court, and without a copy of the transcript, Plaintiffs  
15 are unsure exactly how the Court ruled on the motion and are therefore not clear on how to amend the  
16 Complaint in a way that will not invite a new Motion to Dismiss;

17 WHEREAS, this stipulation is made in good faith and not for the purpose of delay.

18 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their  
19 respective counsel of record, HEREBY STIPULATE and respectfully request that the Court enter an  
20 order extending Plaintiffs’ deadline to file their Third Amended Complaint until five (5) court days after  
21 the parties receive a copy of the court reporter’s transcript of the November 6, 2025, hearing;

22 The Parties FURTHER STIPULATE that in recognition of the Holiday schedule for counsel,  
23 Defendants’ responsive pleading to the Third Amended Complaint shall be extended from December 17,  
24 2025, to January 6, 2026.

25 **IT IS SO STIPULATED.**  
26  
27  
28

Dated: November 26, 2025

**COOK LAW GROUP**

By: /s/ *Ronald J. Cook*  
Ronald J. Cook  
Attorney for Plaintiffs

Dated: November 26, 2025

**GREENBERG TRAURIG, LLP**

By: /S/  
Robert J. Herrington  
Anna Yeung

Attorneys for Defendant  
SAMSUNG ELECTRONICS AMERICA, INC.

Dated: November 26, 2025

**MAIRE & DEEDON**

By: /S/  
Patrick Deedon  
Attorney for Defendant  
COSTCO WHOLESALE CORP.

**ORDER**

Pursuant to the Parties' Stipulation to Extend Plaintiffs' Deadline to File their Third Amended Complaint and to Extend the deadline for Defendants to file a Responsive Pleading, and good cause appearing, the Court orders Plaintiffs' Deadline to File their Third Amended Complaint is extended until five court (5) days after the Parties receive a copy of the court reporter's transcript of the November 6, 2025 hearing with Defendants' deadline to file a responsive pleading extended to January 6, 2026.

**IT IS SO ORDERED.**

Dated: November 26, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE